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June 20, 2025

VIA ECF

The Honorable Jesse M. Furman
Thurgood Marshall United States Courthouse
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Simpson v. Chassen*, Civ. No. 1:25-cv-04004-JMF

Dear Judge Furman:

I represent Defendant Jared Chassen in the above-captioned action and write regarding Defendant Chassen's pending motion seeking sanctions, attorney's fees and an injunction barring further removals without the prior permission of this Court. ECF Nos. 6, 21. Plaintiff Jeffrey Simpson did not submit opposition to the pending motion by the deadline of June 12, 2025. ECF No. 21. Defendant Chassen respectfully requests that the Court grant this motion as unopposed and as soon as possible to prevent further frivolous removals by Plaintiff Simpson. Plaintiff Simpson's multiple prior removals sought to avoid contempt motions and hearings, and there is a pending contempt hearing scheduled for Friday, June 27, 2025 in the state court.

Sincerely,

/s/
Allen Schwartz, Esq.